

NORTH AMERICAN GALVANIZING COMPANY

1461 KINARK CT. • ST. LOUIS, MISSOURI 63132-1483 • (314) 993-1562 • FAX (314) 993-3556

REC'D

JUL 06 1999

RESP

July 2, 1999

Kendra Kennell
Region 7 EPA
901 5th Street
Kansas City, KS 66101

Dear Ms. Kennell,

The caustic sludge, caustic rinse sludge, refractory brick and sand have all characterized as non-hazardous. Please see the attached laboratory results.

I have enclosed all of the information that I have regarding the inspection. If you need any thing further or have any questions, please do not hesitate to contact me. I will be out of the office from July 6th through July 12th but you can reach me at 314-616-8523.

Sincerely
North American Galvanizing



Eddie Sloan
Plant Manager




R00141795
RCRA RECORDS CENTER

NORTH AMERICAN GALVANIZING COMPANY

CORPORATE OFFICE:

2250 EAST 73rd STREET, SUITE 300 • TULSA, OKLAHOMA 74136-6832 • (918) 488-9420 • FAX (918) 488-8172

April 8, 1999

VIA UPS OVERNIGHT

Dedriel Newsome
U.S. EPA, Region VII
25 Funston Road
Kansas City, KS 66115

Dear Dedriel Newsome:

This letter is in response to the Notice of Violation (NOV) issued to North American Galvanizing Co. - St. Louis on 3/26/99. The corrective actions for each citation are addressed below (citations are numbered the same as on the NOV).

1. The caustic liquid solution is not a solid waste because it is not discarded. North American Galvanizing has sampled the caustic sludge, caustic rinse sludge, and refractory bricks. Hazardous waste determinations will be made based on these sampling results. All documentation, including the sampling procedures used, will be forwarded to your office on or before May 28, 1999. North American Galvanizing has implemented a policy following the guidelines of the Missouri Department of Natural Resources Technical Assistance Program on used oil filters (a copy of the guidelines is enclosed with the procedure we will follow highlighted). Two follow up internal audits will be performed by North American Galvanizing in June and October of this year to check for proper implementation by maintenance personnel. Also, a sign with the proper procedures will be placed in the area where the filters are handled. Since North American Galvanizing only generates lamps on an infrequent basis, we will continue to dispose of these in a Missouri sanitary landfill. North American Galvanizing will follow the guidelines established by the MDNR and highlighted in the attached guidance document. A sign on these procedures will be placed in the office to remind personnel of the proper disposal method.
2. The zinc skimmings and dross are sent to Zinc Corporation of America under contract. Both products are used to produce prime western zinc and commercial zinc oxide. Therefore, neither is a solid waste. A copy of a letter from ZCA stating the end products made from this material will follow in a separate mailing and will be kept on file at the St. Louis facility.
3. North American Galvanizing has begun putting the Missouri generator ID# on hazardous waste manifests. A detailed instruction sheet will be placed where the manifests are filled out.
4. North American Galvanizing has begun putting consecutive shipment numbers on hazardous waste manifests in the space labeled "Missouri Manifest Document Number."

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RESP

Denver, CO 80022
4400 E. 61st Ave.
(303) 288-6631
FAX (303) 288-0726

Houston, TX 77041
1910 Cunningham Rd.
(713) 937-3880
FAX (713) 937-1641

Fort (DFW), TX 76053
625 W. Hurst Blvd.
(817) 268-2414
FAX (817) 282-7793

St. Louis, MO 64126
7700 E. 12th
(816) 241-4300
FAX (816) 241-4303

Louisville, KY 40214
6310 Kanjoy Drive
(502) 367-6146
FAX (502) 368-9653

Nashville, TN 37209
200 32nd Avenue N.
(615) 297-9581
FAX (615) 297-9582

St. Louis, MO 63132
1461 Kinark Court
(314) 993-1562
FAX (314) 993-3556

Tulsa, OK 74107
Plant #1
1800 W. 21st Street
(918) 584-0303
FAX (918) 584-1781

Tulsa, OK 74107
Plant #2
2506 W. 26th
(918) 584-6668
FAX (918) 584-5130

Tulsa, OK 74107
Spin Galv
2302 South Union
(918) 584-7746
FAX (918) 584-7747

Catoosa, OK 74015
RSI
1 Bird Creek Avenue
(918) 268-6565
FAX (918) 268-6566



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North American Galvanizing will use the year and sequential numbers, for example: 990001, 990002, etc. for this year. This procedure and a log sheet of the shipment numbers will be part of the detailed instruction sheet mentioned in number 3.

5. North American Galvanizing has begun putting the transporters license plate number on all hazardous waste manifests. This procedure will be included on the detailed instruction sheet mentioned in number 3.
6. North American Galvanizing has begun putting the specific gravity on hazardous waste manifests when using gallons for the amount. This procedure is included on the detailed instruction sheet mentioned in number 3.
7. A Waste Analysis Plan is being developed for the preflux filter cake. The plan will include representative sampling of the waste and will be maintained on-site. North American Galvanizing will submit a copy of the plan to your office on or before May 28, 1999.

If you have any questions, please contact me at the St. Louis facility or Kevin Halstead at our corporate office. North American Galvanizing would like to thank you for your assistance in this matter.

Sincerely,



Eddie Sloan
Plant Manager

cc: Kevin Halstead - Senior Process Engineer
Craig Schaal - Region 2 General Manager

1461 KinArk Court, ST Louis, MO 63132. 314-9931562 - Phone
314-993-3556 -Fax

FAX 4-15-99 @ 9:35 AM

**North American
Galvanizing**

Fax

REC'D

JUL 06 1999

RESP

To: Dedriel Newsome

From: Eddie Sloan

Fax: 913-551-5218

Pages: 5

Phone: 913-551-5058

Date: 4/15/99

Re:

CC:

☐ **Urgent**

☒ **For Review**

☐ **Please Comment**

☐ **Please Reply**

☐ **Please Recycle**

Dedriel,

If you have any questions please do not hesitate to contact me.

Thanks,

Eddie

FLUORESCENT BULB DISPOSAL PROCEDURES

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- 1) Place the burned out bulb in the box the replacement bulb came in. When the box becomes full secure the box and wrap completely with shrink-wrap. Be sure to wrap the box several times to ensure protection of the bulbs.**
- 2) Place the shrink-wrapped box in the trash dumpster being careful not to break the bulbs.**

HAZARDOUS WASTE MANIFEST PROCEDURES

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- 1) Each manifest shall have a sequential number assigned to it. The Plant Manager or the Plant Superintendent will assign the number. The number will be placed in the upper right hand space marked MISSOURI MANIFEST DOCUMENT NUMBER.**
- 2) Each manifest shall have the license plate number of the transporting vehicle written on the manifest in space 7, titled TRANSPORTER 2 COMPANY NAME.**
- 3) Each manifest shall have the specific gravity written on it in location B. Based on an average of all 1998 loads the specific gravity is 1.418.**

USED OIL FILTER DISPOSAL PROGRAM

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- 1) Let forklift run until running temperature has been reached.**
- 2) Remove filter**
- 3) Puncture filter on the dome end and let drain for two weeks**
- 4) Discard**



ZINC CORPORATION OF AMERICA
300 FRANKFORT ROAD MONACA, PA 15061-2285

(724) 774-1080

March 31, 1999 REC'D

Mr. Kevin Halstead
North American Galvanizing Company
2250 East 73rd Street, Suite 300
Tulsa, OK 74136-6832

JUL 06 1999

RESP

Dear Kevin:

In response to your request, this confirms that the galvanizer's skimmings and bottom dross which we receive from North American's plants at Louisville, Nashville, St. Louis, Kansas City, Tulsa and RSI (Port of Catoosa) are treated in our Monaca, PA plant to produce prime western grade zinc metal and commercial zinc oxide.

Sincerely,

T.A. Theobald
Commercial Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 27 1989

James E. Johnson
President
SAFCO Environmental
1255 South 188th
Seattle, Washington 98148

Dear Mr. Johnson:

This letter responds to your February 13, 1989 letter concerning the regulatory requirement for a Resource Conservation and Recovery Act (RCRA) storage permit for facilities engaged in hazardous waste recycling activities. In particular, you ask whether a storage permit is required for your recycling of hazardous wastes by blending, mixing, physical separation, or distillation without prior storage of the hazardous wastes.

The Agency does not require a storage permit for activities where no storage occurs. For example, if a hazardous waste is received at the recycling facility and immediately fed directly into the recycling process (i.e., no storage occurs), then a RCRA storage permit would not be required. In your letter, you state that you have heard that a holding time of 24 hours is allowed prior to the waste being directly fed into the recycling process. Federal regulations do not specify an allowable "holding time" prior to the waste being introduced to the recycling process; however, the appropriate EPA Regional office or authorized State regulatory agency may specify such a holding time on a site-specific basis, defining a time at which storage begins. As you stated, some States and Regions do allow up to 24 hours for the off-loading of a hazardous waste into the recycling process before the waste is considered to be stored, thus requiring a storage permit.

I should also point out to you that hazardous waste fuel blending tanks are subject to storage regulations. As the April 13, 1987 Federal Register notice specifically states, tanks used for blending hazardous waste fuels or for settling out impurities are subject to regulation as storage tanks, and are not exempt recycling units (see 52 FR 11820).

In your letter, you also raised a question on the possibility of case-by-case regulation of recycling activities under 40 CFR 261.6(c). As you noted, case-by-case regulation of

FaxBack# 11411

- 2 -

certain recycling activities is already provided for under 40 CFR 260.40. The Agency is not currently planning to modify these regulations; however, EPA is reevaluating the regulations applicable to recycling activities and may determine that regulatory amendments are necessary to encourage environmentally protective recycling.

Finally, you should be aware that local and State governments may have applicable regulations that differ from Federal regulations. You should contact your State regulatory agency, as well as the appropriate EPA Regional office for specific answers about your recycling activities.

Sincerely,

Matthew A. Straus

Matthew A. Straus
Deputy Director
Characterization and
Assessment Division

REC'D

JUL 06 1999

Waste Management of Ohio, Inc. ^{RESP}

3956 State Route 412
Videry, Ohio 43464
419-547-3306
Fax: 419-547-6144

FAX TRANSMISSION COVER SHEET

Date: April 12, 1999
To: Eddie Slone
Fax: 314-993-3556
Re: 1998 Shipments
Sender: Robin Wuertz

YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET. IF
YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 419-547-3306.

Hi Ed!

Per your request, all 1998 shipments.

Thanks,

Robin


Specific Grav. + y

Average

REC'D

Date 1/14/99 Time 11:17:17

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY WR REPORT

JUL 06 1999

Dates 1/01/98 Thru 12/31/98

EPA I.D.NO.

G 2 OHD020273815 REC'D No 211

Generator's EPA I.D. MOD006284335

Generator Name NORTH AMERICAN GALVANIZING CO

Generator Address 1461 KINARK DR
SAINT LOUIS MO 63132-1407

EPA Hazardous

Description of Waste

Waste Codes

Sys Form RadioAtv

Quantity

Type Code Mixed

Received JOM ASCII Pg

Receipt Number	Doc Seq#	DocLine Item Nbr	Document Number	Business Number	Profile Number	Quantity	UOM	Spec Grav	Converted Quantity	UWV
000130558	1	1	9741760012	1057684	BQ8837	41140.00	410	1.4100	3503.5188	G
000130559	1	1	9741760014	1057684	BQ8837	38860.00	410	1.4100	3309.3520	G
000130560	1	1	9741760013	1057684	BQ8837	41240.00	410	1.4100	3512.9349	G
000134318	1	1	0000000010	1057684	BQ8837	36283.00	410	1.3900	3134.0921	G
000134324	1	20	9741760011	1057684	BQ8837	37440.00	410	1.3800	3257.7371	G
000134325	1	2	9741760012	1057684	BQ8837	40340.00	410	1.4150	3423.2509	G
000135869	1	1	0000041104	1057684	BQ8837	38800.00	410	1.4400	3235.4039	G
000135873	1	1	0000041105	1057684	BQ8837	40320.00	410	1.4450	3350.5180	G
000136276	1	1	0000010168	1057684	BQ8837	37880.00	410	1.4500	3136.9041	G
000136277	1	1	0000010169	1057684	BQ8837	39720.00	410	1.4350	3323.6602	G
HYDROCHLORIC ACID								M134 B103 W	33186.4720	G 271 1

April 20, 1999

Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, Missouri 65102

REC'D

JUL 06 1999

RESP

To Whom It May Concern,

This letter is to inform you that Eddie Sloan is the primary contact and David George is the secondary contact at North American Galvanizing Co. 1461 Kinark Ct. St. Louis, MO 63129. Our telephone number is 314-993-1562 and our Fax number is 314-993-3556.

Sincerely
North American Galvanizing

Eddie Sloan
Plant Manager